

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

RUSS GODFREY and  
NATALIE GODFREY,

Plaintiffs,

CSAA FIRE & CASUALTY  
INSURANCE COMPANY,  
a foreign corporation,

Defendant.

Case No. 19-CV-329-JD

**DEFENDANT’S OBJECTIONS TO  
PLAINTIFFS’ DEPOSITION DESIGNATIONS**

In compliance with the Court’s Scheduling Order entered July 1, 2019 (Doc. 15) and the Court’s Order of February 28, 2020 (Doc. 101) granting Defendant an extension in which to file Defendant’s Objections to Plaintiffs’ Deposition Designations, Defendant submits the following Objections to Plaintiffs’ Deposition Designations as follows:

**1. Objections to Plaintiffs’ Designations of Mark S. Costello:**

Start Page/Line	End Page/Line	Objections
8/9	8/10	FRE 401, 402, 403
8/21	8/25	FRE 401, 402, 403
45/9	46/3	FRE 401, 402, 803, Speculation
46/5	46/12	FRE 803
46/17	47/3	FRE 401, 412, Argumentative
65/11	68/23	<i>See Motion in Limine</i> No. 12
134/22	136/8	<i>See Motion in Limine</i> Nos. 3, 11

Start Page/Line	End Page/Line	Objections
167/4	167/14	FRE 401, 402
182/12	182/15	FRE 401, 402

**2. Objections to Plaintiffs' Designations of Allen Lippoldt:**

Start Page/Line	End Page/Line	Objections
47/2	47/6	FRE 803
49/2	49/22	FRE 803
55/10	55/13	FRE 803
61/4	61/10	FRE 803
63/15	63/18	Speculation
75/18	75/25	FRE 401, 402
76/17	76/21	Speculation
77/1	79/1	FRE 803
80/9	80/15	FRE 401, 402, Speculation, Argumentative
83/17	84/20	Lack of foundation, Speculation, 401, 402
85/8	88/1	401, 402, 803, Lack of foundation, Lack of personal knowledge, <i>see</i> Motion <i>in Limine</i> No. 11

Respectfully Submitted,

s/Bruce A. Robertson

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2020, I transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following registrants:

Steven S. Mansell  
Mark A. Engel  
Kenneth G. Cole  
M. Adam Engel  
Keith F. Givens

s/Bruce A. Robertson

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Bruce A. Robertson